

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC, <i>et al</i>	§	CASE NO. 20-50805-rbk
	§	
DEBTOR	§	(Jointly Administered)

**KRISJENN RANCH, LLC, KRISJENN RANCH LLC, SERIES UVALDE RANCH, AND
KRISJENN RANCH, LLC, SERIES PIPELINE ROW’S MOTION TO EXPEDITE
HEARING ON DEBTORS’ DISCLOSURE STATEMENT AND SET EXPEDITED
CONFIRMATION DATES**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row (collectively, the “Debtors”), the Debtors and Debtors-in-Possession in the above captioned case, hereby file this Motion to Expedite Hearing on Debtors’ Disclosure Statement and Set Expedited Confirmation Dates (the “Motion”) and in support of this Motion, the Debtors respectfully represent as follows:

1. The Disclosure Statement hearing has been reset several times due to pending litigation between Debtors and Mcleod Oil, and the case is almost two years old.
2. Mcleod and Debtors have settled their dispute pending documentation.
3. There are very few remaining parties in interest.
4. The Disclosure Statement is currently set for hearing on February 22, 2022.
5. Debtors have filed there third amended plans and disclosure statements with the Court.
6. Debtors Request the Court set the Disclosure Statement for hearing on an expedited basis to facilitate quickly bringing the case to a close.

7. Additionally, Debtors also request the Court shorten the confirmation dates such that 1) Debtors mail out the disclosure statement and plan within 3 days of the hearing; 2) the deadline for objections and votes be set for 14 days after the date of mailing; and 3) have confirmation three days thereafter.

WHEREFORE, Debtors respectfully request that the Court enter an Order resetting the hearing on Debtors' Disclosure Statement on an expedited basis, enter an order shortening the confirmation deadlines as requested herein, and grant Debtors all other relief they are justly entitled.

Dated: January 14, 2022

Respectfully submitted,

By: /s/ Ronald J. Smeberg

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ATTORNEY FOR DEBTORS

CERTIFICATE OF CONFERENCE

I hereby certify that on January 14, 2022, I conferenced with counsel for McLeod Oil, the US Trustee and Counsel for DMA either by phone or via email regarding this motion. All three parties are unopposed.

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2022, true and correct copies of the foregoing motion will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

SERVICE LIST

DEBTOR

KrisJenn Ranch, LLC
410 Spyglass Rd
Mc Queeney, TX 78123-3418

GOVERNMENT ENTITIES

Office of the UST
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San Antonio, TX 78295-1539

U.S. Attorney
Attn: Bkcy Division
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San Antonio, Texas 78216

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026 AUS
Austin, TX 78701

Texas Comptroller of Public
Account
Attn: Bankruptcy
P.O. Box 149359
Austin, TX 78714-9359

Angelina County Tax Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Nacogdoches County Tax
Assessor Collector
101 West Main Street
Nacogdoches, Texas 75961

Rusk County
202 N Main St,
Henderson, Texas 75652

Shelby County, Tax Collector
200 St. Augustine St.
Center, Texas 75935

Tenaha ISD Tax Assessor-
Collector
138 College St
Tenaha, TX 75974-5612

Uvalde Tax Assessor
Courthouse Plaza, Box 8

Uvalde, Texas 78801

NOTICE PARTIES

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UNSECURED CREDITORS

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C&W Fuels, Inc.
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San Antonio, TX 78212-3135

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Uvalde, TX 78801-3602

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Medina Electric
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Hondo, TX 78861-0370

Medina's Pest Control
1490 S Homestead Rd
Uvalde, TX 78801-7625

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Uvalco Supply
2521 E Main St
Uvalde, TX 78801-4940

Longbranch Energy
c/o DUKE BANISTER
RICHMOND
Po Box 175
Fulshear, TX 77441-0175

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